
Emily Bratton <ebratton@fordobrien.com>
To: Thomas.Carter.III@usdoj.gov
Cc: Matthew Aaron Ford <mford@fordobrien.com>, Cara Filippelli <cfilippelli@fordobrien.com>, scott.armstrong@usdoj.gov, john.liolos@usdoj.gov

Thu, Feb 16, 2023 at 2:10 PM

Good Afternoon Mr. Carter,

Please find attached to this email a letter requesting a Bill of Particulars.

Please let me know if you have any questions or concerns!

Kind Regards,

Emily Bratton
Paralegal
Ford O'Brien Landy LLP
3700 Ranch Road 620 South
Suite B
Austin, Texas 78738

—
275 Madison Avenue
24th Floor
New York, New York 10016
212.858.0040
fordobrien.com

 Constantinescu Bill of Particulars FINAL.pdf
274K

Liolos, John (CRM) <John.Liolos@usdoj.gov> Fri, Feb 17, 2023 at 9:39 AM
To: Emily Bratton <ebratton@fordobrien.com>, "Carter III, Thomas (USATXS)" <Thomas.Carter.III@usdoj.gov>
Cc: Matthew Aaron Ford <mford@fordobrien.com>, Cara Filippelli <cfilippelli@fordobrien.com>, "Armstrong, Scott (CRM)" <Scott.Armstrong@usdoj.gov>

Received, thanks. We'll review and respond.

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Cara Filippelli <cfilippelli@fordobrien.com> Wed, Mar 1, 2023 at 1:22 PM
To: "Liolos, John (CRM)" <John.Liolos@usdoj.gov>
Cc: Emily Bratton <ebratton@fordobrien.com>, "Carter III, Thomas (USATXS)" <Thomas.Carter.III@usdoj.gov>, Matthew Aaron Ford <mford@fordobrien.com>, "Armstrong, Scott (CRM)" <Scott.Armstrong@usdoj.gov>

Good afternoon,

Please find attached to this email a *Brady* letter on behalf of Mr. Constantinescu.

Thank you,

--
Cara J. Filippelli
Associate
FORD O'BRIEN LANDY LLP
3700 Ranch Road 620 South
Austin, Texas 78738

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275 Madison Avenue
24th Floor
New York, New York 10016
Tel: +1 (212) 858-0040
cphilippelli@fordobrien.com
fordobrien.com

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 [03.01.2023 Constantinescu Brady Letter.pdf](#)
641K

Matthew Aaron Ford <mford@fordobrien.com>

Wed, Mar 8, 2023 at 2:22 PM

To: "Liolos, John (CRM)" <John.Liolos@usdoj.gov>

Cc: Emily Bratton <ebratton@fordobrien.com>, "Carter III, Thomas (USATXS)" <Thomas.Carter.III@usdoj.gov>, Cara Filippelli <cphilippelli@fordobrien.com>, "Armstrong, Scott (CRM)" <Scott.Armstrong@usdoj.gov>

John,
Do you have any update on the Bill of Particulars or *Brady* material? Are you objecting to either?
Best,
Matt

Matthew Aaron Ford
Partner
Ford O'Brien Landy LLP
3700 Ranch Road 620 South
Suite B
Austin, Texas 78738
512.503.6388 (direct)

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275 Madison Avenue
24th Floor
New York, New York 10016
212.858.0040
212.444.4886 (direct)
mford@fordobrien.com
fordobrien.com

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Liolos, John (CRM) <John.Liolos@usdoj.gov>

Wed, Mar 8, 2023 at 11:30 PM

To: Matthew Aaron Ford <mford@fordobrien.com>

Cc: Emily Bratton <ebratton@fordobrien.com>, "Carter III, Thomas (USATXS)" <Thomas.Carter.III@usdoj.gov>, Cara Filippelli <cphilippelli@fordobrien.com>, "Armstrong, Scott (CRM)" <Scott.Armstrong@usdoj.gov>

Matt,

With respect to the tickers, we will be providing by the end of the month a list of tickers and time ranges relevant to the profit allegations in paragraph one of the Superseding Indictment.

With respect to the *Brady* requests, we understand our discovery obligations, have complied with them, and will continue to do so.

With respect to the rest of your requests, we otherwise decline to disclose the requested information at this time.

Regards,

John

John J. Liolos

Trial Attorney

Criminal Division, Fraud Section

U.S. Department of Justice

[1400 New York Avenue NW](#)

Washington, DC 20005

[202-768-2246](#)

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